

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN J. AQUINO,
CHAPTER 7 TRUSTEE
By Its Assignee,
Convergent Distributors of Texas, LLC

Plaintiff,

v.

ALEXANDER CAPITAL, LP
&
Its Managing Partners:
JOSEPH AMATO,
ROCCO GUIDICIPIETRO, and
NESA MANAGEMENT, LLC

Defendants

Case #1:21-cv-01355-JSR

**PLAINTIFF'S SUPPLEMENT TO DAMAGES SECTION V(A)
OF THE PARTIES' JOINT PROPOSED PRETRIAL CONSENT ORDER**

Punitive Damages Claim

Plaintiff, to the extent allowed by law, intends to seek exemplary and punitive damages based on the expected evidence at trial showing Defendants intentionally engaged in fraudulent conduct in a persistent, reckless, willful and wanton manner and with a conscious disregard for the rights of ACLP' client.

Dated: June 21, 2023.

Respectfully Submitted By:

/s/ William C. Rand
William C. Rand, Esq.
501 Fifth Ave. 15th Floor
New York, N.Y 10017
Tel: 212-286-1425
Email: wcrand@wcrand.com
Attorney for Plaintiff by its assignee
Convergent Distributors of Texas, LLC